

# EXHIBIT A

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**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

<b>MMAS RESEARCH LLC,</b>	)	
	)	
<b>Plaintiff</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 24-cv-12108-DJC</b>
	)	
<b>THE CHILDREN'S HOSPITAL CORPORATION, et. al.,</b>	)	
	)	
<b>Defendants.</b>	)	
	)	
	)	
<hr style="width: 40%; margin-left: 0;"/>	)	

**DECLARATION OF F. CHRISTOPHER AUSTIN IN SUPPORT OF MORISKY  
DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION FOR LEAVE TO FILE A  
SECOND AMENDED COMPLAINT**

I, **F. Christopher Austin**, declare as follows:

1. I am an attorney licensed to practice law in the State of Nevada and am the principal of Lex Tecnica, Ltd., located in Las Vegas, Nevada. I submit this declaration solely in my capacity as counsel for the Morisky Defendants, not in my personal capacity, and expressly without submitting to the personal jurisdiction of this Court as set forth in the Reservation of Rights in Defendants' Opposition to Plaintiff's Motion for Leave to File a Second Amended Complaint, which reservation of rights is expressly incorporated herein as if set forth in full.

2. I have personal knowledge of the facts set forth herein and could competently testify to them if called as a witness.

3. I am not a resident of Massachusetts. I do not maintain an office, own property, maintain bank accounts, advertise, or conduct business in Massachusetts. I have visited the state twice in my life, once to run the Boston Marathon in 2011, and once to appear at a court-ordered hearing on behalf of my clients in this action.

4. My involvement in the matters referenced in Plaintiff's proposed Second Amended Complaint arises from my role as counsel for the Morisky Defendants in litigation pending in the United States District Court for the Western District of Washington.

5. In or about April 21, 2022, acting solely in my capacity as counsel for the Morisky Defendants, I drafted a letter addressing false allegations made by MMAS Research LLC concerning the status of the Washington litigation at the time and the Morisky Defendants' intellectual property rights related thereto.

6. I provided that letter only to my client at my client's request. I did not send, transmit, or distribute the letter to any third party.

7. Any subsequent distribution of the letter to third parties was undertaken solely by my client and not by me.

8. I was not aware that the letter had ever been sent to anyone affiliated with Boston Children's Hospital until the filing of this action by Plaintiff.

9. In or about October 2024, Sanofi contacted my client and emailed the settlement agreement it entered into with Plaintiff. At the request of my client I responded to Sanofi's request for court orders and filings regarding the Washington Court's issuance of sanctions against Plaintiff for discovery abuses in that action, including striking Plaintiff's counterclaims and awarding over \$80,000 in fees and costs to Dr. Morisky.

10. In response to Sanofi's inquiry, I provided information regarding the status and pleadings of the Washington litigation.

11. I did not instruct, request, or suggest that Sanofi breach any agreement, withhold payment, alter contractual obligations, or take any adverse action against MMAS Research LLC.

12. I had no role in the authorship, editing, publication, or dissemination of the August 2025 Harvard publication referenced in Plaintiff's proposed Second Amended Complaint.

13. I did not communicate with Harvard Medical School or its personnel regarding that publication.

14. At no time did I purposefully direct communications into Massachusetts for my own benefit or seek to invoke the benefits or protections of Massachusetts law. All actions referenced above were undertaken from Nevada, solely in my role as litigation counsel for non-Massachusetts clients, in connection with pending federal litigation outside this forum.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: January 29, 2026.

/s/ F. Christopher Austin  
F. CHRISTOPHER AUSTIN, ESQ.  
Nevada Bar No. 6559  
10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145